

**UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF DELAWARE**

<b>DYSON TECHNOLOGY LIMITED</b>	)	
<b>and DYSON, INC.,</b>	)	
	)	
	)	<b>Plaintiffs,</b>
<b>v.</b>	)	<b>Civil Action No. 05-434-GMS</b>
	)	
<b>MAYTAG CORPORATION,</b>	)	
	)	
	)	<b>Defendant.</b>

**DEFENDANT/COUNTER-CLAIMANT'S RULE 30(B)(6)**  
**NOTICE OF DEPOSITION TO PLAINTIFFS**

**TO:** COUNSEL OF RECORD ON ATTACHED SERVICE LIST

**PLEASE TAKE NOTICE** that pursuant to Federal Rule of Civil Procedure 30(b)(6), Defendant/Counter-Claimant Maytag Corporation ("Maytag"), by its attorneys will take the videotaped deposition upon oral examination of Plaintiffs Dyson Technology Limited and Dyson Inc. (collectively, "Dyson" or "Plaintiffs"), through one or more of their officers, directors, managing agents, employees or other persons designated to testify on their behalf, with respect to each of the following subject matters set forth in "Schedule A" attached hereto.

The depositions will take place under oath and before a duly authorized notary public, or other person authorized by law to administer oaths. The depositions will be by and through its attorneys will take the videotaped deposition upon oral examination of: recorded by stenographic means by a court reporter. The depositions will take place on October 26 and 27, 2006 at the offices of at Connolly Bove Lodge & Hutz LLP, The Nemours Building, 1007 North Orange Street, Wilmington, Delaware 19801 or at such other time and place as the parties may agree.

Maytag further request that Dyson produce, within 30 days of this notice, any and all documents in their custody, possession, or control concerning, related to, or referring to any of the subject matters or topics described in Schedule A that have not already been produced. You are requested to produce the witnesses at the agreed time and indicated place and are invited to attend.

Respectfully submitted,

**MAYTAG CORPORATION**

By:



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## **SCHEDULE A**

### **DEFINITIONS**

The following words and terms shall apply to this Schedule and shall have the meaning set forth below:

A. "Counterclaims" means the Counterclaims filed in this action on or about August 1, 2005 and the Amended Counterclaims that Maytag sought leave to file on March 24, 2006.

B. "Date" means the exact day, month and year, if ascertainable, or if not, the best approximation possible.

C. "Document" includes, without limitation, any record of any kind, whether written, graphic, pictorial, photographic, phonographic, mechanical, taped, electronic or otherwise, and every non-identical copy, now or formally in your possession, custody or control. The term also includes "papers," "correspondence," "memoranda," "e-mails," "instant messages," "short text messages," "notes," "reports," "writings" and/or "recordings" of any kind. A draft or non-identical copy is a separate document within the meaning of this term.

D. "Identify" means:

(1) with respect to a natural Person, to state his or her full name and present or last known business and residential addresses, telephone numbers, business title, and business affiliation;

(2) with respect to an entity other than a natural Person, to state its full name, address or principal place of business, form of organization, and state of incorporation, if known;

(3) with respect to a Document presently in Your possession, custody or control, to state the type of Document (e.g., letter, fax, check, insurance policy,

agreement, email, calendar, note pad, spreadsheet, database, video recording); its size (e.g., number of pages); its contents; the Persons who drafted or prepared it; the Persons who received it; its date of creation or publication; any distinguishing numbers associated with it (e.g., Bates numbers, account numbers, or policy numbers); and its present location;

(4) with respect to a Document that is known to have existed but no longer exists or no longer is in Your possession, custody or control, to state as much of the information from the previous paragraph as possible; the date on and circumstances under which the Document was lost, destroyed, or otherwise became unavailable to You; and the Document's present or last known custodian and location; and

(5) with respect to a Communication, to identify each party to the Communication; the place at which each party was located; the date and substance of the Communication; and the method by which it was communicated (e.g., in person, by telephone, or by email).

E. "Person" means any natural person or any business, legal, or governmental entity or association.

F. "Relating to" or "Related to" means referring to, concerning, responding to, commenting on, regarding, discussing, showing, describing, reflecting, implying, analyzing, consisting of or evidencing.

H. The connectives "and" and "or" shall be construed either disjunctively or conjunctively as necessary to bring within the scope of these Requests, the production of any documents that might otherwise be construed to be outside the scope of any Requests.

I. “Defendant” or “Maytag” means Defendant Maytag Corporation, including its division, the Hoover Company and/or any of its officers, directors, employees, attorneys, consultants, representatives, and agents.

J. “You,” “Your,” “Yourself,” “Dyson,” or “Plaintiffs” means Dyson Technology Limited and/or Dyson Inc., and shall include any of its officers, directors, employees or other agents, any of its divisions, operating groups or units, any of its corporate parents, affiliates or subsidiaries, and any of its predecessors or successors.

**DEPOSITION TOPICS**

1. The bases for Dyson's contentions that Maytag infringes the patents-in-suit.
2. The damages that Dyson contends it has suffered as a consequence of the purported patent infringements of Hoover.

**CERTIFICATE OF SERVICE**

I, Francis DiGiovanni, hereby certify that on October 4, 2006, copies of the foregoing document were served on the following counsel of record in the manner indicated:


**BY HAND DELIVERY AND E-MAIL:**

C. Barr Flinn  
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